

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
(Boston)

IN RE:

Yvonne V. Skapars
Debtor

CHAPTER 13
CASE NO. 15-11221-JNF

MOTION TO APPROVE STIPULATION

Now comes Champion Mortgage Company and states that a stipulation was entered into by Champion Mortgage Company and the Debtor, Yvonne V. Skapars on September 14, 2015. Champion Mortgage Company respectfully requests that this Court Approve said stipulation subject to the following language:

IF THE DEBTOR FAILS TO MAKE SAID PAYMENTS BY THE DATES SPECIFIED IN PARAGRAPH TWO OF THIS STIPULATION, RELIEF FROM STAY MAY BE GRANTED WITHOUT HEARING BY THE COURT UPON LENDER FILING A CERTIFICATE OF NON-COMPLIANCE TEN (10) DAYS NOTICE OF DEFAULT TO THE DEBTOR AND TO THE DEBTOR'S ATTORNEY, BY FIRST CLASS MAIL, POSTAGE PREPAID, OR BY FACSIMILE. A \$50.00 FEE SHALL BE CHARGED FOR EACH NOTICE OF DEFAULT, AND A \$150.00 FEE SHALL BE CHARGED FOR EACH CERTIFICATE OF NON-COMPLIANCE NEEDED THROUGHOUT THE LIFE OF THIS STIPULATION AGREEMENT. THE DEBTOR HAS THE RIGHT TO OBJECT TO THE CERTIFICATE OF NON-COMPLIANCE ONLY ON THE BASIS THAT THE PAYMENTS WERE MADE TIMELY UNDER THE STIPULATION.

Respectfully submitted,
Champion Mortgage Company
By its Attorney,

/s/ Tatyana P. Tabachnik
Tatyana P. Tabachnik, Esquire
BBO# 673236
HARMON LAW OFFICES, P.C.
150 California Street
Newton, MA 02458
617-558-0500

Dated: September 14, 2015

mabk@harmonlaw.com

NOTICE

All Objections to this Motion must be filed within fifteen (15) days of this date unless otherwise ordered by Court.

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CERTIFICATE OF SERVICE

I, Tatyana P. Tabachnik, Esquire, state that on September 14, 2015, I electronically filed the foregoing Motion with the United States Bankruptcy Court for the District of Massachusetts using the CM/ECF System. I served the foregoing document on the following CM/ECF participants:

John Fitzgerald, Esquire, Assistant U.S. Trustee
Carolyn Bankowski, Esquire, Chapter 13 Trustee
Peter M. Daigle, Esquire for the Debtor

I certify that I have mailed by first class mail, postage prepaid, the documents electronically filed with the Court on the following non CM/ECF participants:

/s/ Tatyana P. Tabachnik
Tatyana P. Tabachnik, Esquire
BBO# 673236

Estate of Aurelis V. Skapars
122 Oakmont Road
Yarmouth Port, MA 02675

Yvonne V. Skapars
122 Oakmont Road
Yarmouth Port, MA 02675

Office of Tax Collector
1146 Route 28
South Yarmouth, MA 02664

Office of the US Attorney
For the District of Massachusetts
John Joseph Moakley Federal Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210